

# EXHIBIT 11

**In the Matter Of:**  
**Fair Fight vs Raffensperger**

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**30(b)(6) Raphael Warnock - Confidential**

*November 07, 2019*

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3200 COBB GALLERIA PARKWAY  
SUITE 265  
ATLANTA, GA 30339

1 to review your new article in the Washington Post.

2 A. Sure.

3 Q. Okay. And is that article what we've  
4 marked as Exhibit 8?

5 A. Yes.

6 Q. Okay. So let's talk about Exhibit 8,  
7 then. And on the second physical page, come back  
8 to the middle of that paragraph, the first  
9 paragraph:

10 "The system is functioning exactly  
11 as it was designed."

12 Does Ebenezer Baptist --

13 A. Where are we?

14 Q. I'm sorry. Exhibit 8, middle of the  
15 first full paragraph.

16 A. First page?

17 Q. Second page.

18 A. Second page. I see it, okay.

19 Q. "The system is functioning exactly  
20 as it was designed."

21 Does Ebenezer Baptist Church have  
22 evidence of a designed intent behind the current  
23 Georgia elections system that you're referencing  
24 there?

25 MR. DUBOSE: Objection.

1 THE WITNESS: I'm speaking.

2 BY MR. TYSON:

3 Q. Uh-huh.

4 A. And I believe that there's evidence.

5 I -- when you say does Ebenezer Baptist Church have  
6 evidence of that, it's a little bit of a tricky  
7 situation because there's diversity within the  
8 congregation.

9 So all of my members don't share my  
10 views, theological or political. And they're not  
11 required to and there's no need to. But the  
12 corporation, that is, the trustees of the church  
13 and the deacons, apparently felt that there was  
14 enough evidence to vote unanimously to sue the  
15 state of Georgia.

16 Q. Uh-huh.

17 A. So there's -- it's a 6,000 member church,  
18 a lot of diverse opinions, people on both sides of  
19 the aisle and independents. So that's -- so when  
20 you say does Ebenezer have, are we talking about  
21 the church? The members?

22 Are we talking -- but the corporation  
23 itself represented by the trustees and the deacons  
24 felt that there was enough compelling evidence to  
25 file a lawsuit, or to serve as a plaintiff in a